

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
KELLY PRICE

PLAINTIFF

-against-

DETECTIVE LINDA SIMMONS Individually,
and as an employee of the New York City Police
Department, ADA MARIA STROHBEHN and
ADA KENYA WELLS Individually,
and as employees of the New York County
District Attorney's Office, THE CITY OF NEW YORK,
Deputy DA Audrey Moore, ADA Larry Newman, ADA
Laura Higgins nee Richendorfer, DA Cyrus Vance Jr.,
as employees of the New York County District
Attorney's Office, Inspector Obe of the New York City
Police Department, in her capacity as an employee
of the New York City Police Department,
Rose Pierre-Louis in her capacity as the Former
Commissioner of Domestic Violence of the
City of New York, PO Matthew Winters, individually
And in his capacity as an employee of the New York City
Police Department, Manhattan District Attorney's Employee

DEFENDANTS,

Notice of Intention to Refile Complaint as Ordered by

Hon. Loretta A. Preska 30 days from date of Receipt of Order by 9/1/16

Kelly Price

Pro Se

534 w 187th st. apt #7

New York, NY 10033

August 25, 2016

Dear Hon. Preska:

By order dated July 26, 2016, and post-marked to me on July 27, 2016 (Exhibit #1) you requested that I
amend my complaint for the above-noted docket. In your order you instructed me to fulfill your instructions within
thirty (30) days. The order was post-marked at the Federal Courthouse on 7/27/2016. I received the order in the

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mail on August 2, 2016. I will be submitting a revised complaint as per your very generous instructions on September 1, 2016 as I need the entire 30 days to dispatch the work.

I am also submitting a motion for reconsideration as I would like to include in my complaint actions undertaken by the NYPD and MDAO before my false arrest(s) that commenced on March 24, 2011 and was (were) resolved/dismissed on or about July 24, 2012. I feel I am entitled to ask the court for reconsideration as I had no reason to know of the injury that is the basis for those pre-arraignment claims in 2011 when I was suffering from severe Complex Post-Traumatic Stress Disorder (Exhibit #2 Mental Health Diagnosis of C-PTSD and #3 Notes from CONNECT NYC detailing confusing and traumatic time in my life in 2011) and consistently triggered by attacks by my pimp and batterer's associates with no protection from the NYPD. My focus was on my survival: I had no way of filtering the constitutional violations being levied against me by the very-sophisticated players who also called themselves assistant district attorneys at that time. As section 1983 claims generally accrue when a plaintiff knows or has reason to know of the injury that is the basis of the claim (*Hogan v Fischer*, 783 F.3d 509, 518 (2^d Cir. 2013)). I am filing to formerly ask the court to reconsider its decision as ordered on July 26, 2016 to limit my claims to July 24, 2012, the date of dismissal of charges against me. I would like to be able to file for all actions by the NYPD and MDAO against me from the date of their first arrest of me on or about in October, 2010 for allegedly filing a false police report (Dismissed and sealed also on 7/24/2012.) I hope very much that the court will give me the opportunity to include in my complaint constitutional harms to me that occurred before my arraignments.

Additionally, I will be turning in a request for PRO BONO counsel to the court with my re-write for the following reasons:

(1) The constant reminder of the traumatic events I have to deal with in the complaint re-writing is a strain on my emotional, mental and physical well-being. Traumatic events are stored in a separate part of the brain and recalling them activates chemicals in the brain that make accurate memory recall about the traumatic incident impossible, spur emotional upsets, (Exhibit #4 The Neuroscience of Trauma) and ramp up symptoms of C-PTSD considerably (Exhibit #2 Mental Health Diagnosis.)

(2) The City Law Department has already put the appellant panel on notice (Exhibit #5 Letter from City Law Department dated 1/27/2016) that it will not be representing three of the parties named in my complaint (Simmons, Obe and Pierre-Louis) and I have no way of tracking down the addresses of a retired NYPD police officer (I did this once before and it took me four years to track down Lt. LaRocca in Florida and even then I got extremely lucky), a

former NYC Commissioner of Domestic Violence, and a Current NYPD Police Inspector.

(3) I have held out hope that either Alex Reinert, Ron Kuby or Norman Siegel would take my case but they are all so busy. Currently Mr. Siegel has expressed much interest in my case because I pointed out that quite possibly the absolute immunity defenses of the MDAO may be stricken as their actions towards me in their role as court advocate were INTER-TWINED with NON-ADVOCATE functions of intervening in the NYPD's investigative process as Lt. LaRocca's affidavit suggests (Exhibit #6 Affidavit from Lt. Larocca). As established in *Doe v. Phillips* (citing *Doe v. Phillips*, 81 F.3d 1204 (2d Cir. 1996)). I will need an attorney to help me navigate this very complicated case law.

(4) I am also in desperate need of a lawyer to help me guide the class of people maliciously prosecuted by the MDAO for CPLR 240.30(1) and other trafficking victims whose rights were eschewed by authorities seeking to make use out of their proffer on other, unrelated cases and unjustly targeted for prosecution and placed on the "Comp-Stat" list. I have found many other victims that have suffered the same constitutional injuries springing from the same ill-charged statute of the NYS penal code in the interim between your two orders and want to try to order the city to change its practices.

For the above-stated reasons I am asking you to allow me the full 30-days from the date that I received your order to re-write my complaint and not to dismiss the action before you are in receipt of it on 9/1/16. I'm not sure if I should turn it in as I am requesting a reconsideration of that order but I don't want to risk dismissal so will turn it in regardless. If you do choose to grant my request for reconsideration and allow me to include actions dating from prior to 7/24/2012's criminal case dismissals please feel free to ignore the re-write I hand in on 9/1/16. Likewise if you do grant me pro bono counsel and grant leave for that person to rewrite my complaint please do feel free to ignore the third amended complaint I turn in on 9/1/2016 as well.

Hon. Judge Preska: Thank you for your patience and kindness towards me and my pleadings. This case represents the entirety of the dreams I have for my future. The possibility to have codified by the Federal Court that I was wronged, that my life was felled at the point when I was at my darkest, weakest, and most vulnerable by the very people meant to protect me is the stuff that keeps me going and I can't thank you enough for continuing to offer me and my sad pleadings a glimmer of hope.

Kelly Price

A handwritten signature in blue ink, appearing to read 'Kelly Price', with a large, stylized loop at the end.

Sworn to me this 25th Day of August:



Darlene A. Leidholt, Notary Public
Registration No. 02LE6267027
Expires 8/27/16

EXHIBIT #1

CLERK
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
EL PATRICK MOYNIHAN UNITED STATES COURTHOUSE
400 PEARL STREET - NEW YORK, NY 10007-1312

OFFICIAL BUSINESS

00CKETSERVICES

Kelly Price
534 W. 187th Street
Apt. # 7
New York, NY 10033



EXHIBIT #2



115 West 31st Street . 5th Floor . New York, NY 10001
PH 212 564 6006 . FAX 212 564 3440 . WWW.CCMNYC.ORG

January 25, 2016

To Whom It May Concern,

Ms. Kelly Price is a client here at the Manhattan clinic of Community Counseling and Mediation. She is seen for weekly psychotherapy and has been diagnosed with: F43.10 Posttraumatic Stress Disorder. She began treatment on December 29, 2015 and her most recent appointment was Friday, January 15th.

Please inform if there is any additional information you may need.

Sincerely,



Alyssa Rodriguez, MHC Intern

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EXHIBIT #3

Services		
Service Date	Service Notes	Type of Service
9/7/2011	SD met with CL at CVTC.	CVTC
9/7/2011	SD did a lot of CC with CL during our meeting.	Crisis Counseling
9/7/2011	SD s/w CL about the likelihood that the charges against her will be dropped.	Info-Legal
9/7/2011	SD s/w CL about the history of DV b/w them and described the common tactics used by abusers to get what they want.	Info-Other
9/7/2011	SD advised CL that the court calendar governs when certain things happen, so if the ADA is planning on dropping the charges, he/she can do so at that court date.	Info-Legal
9/7/2011	SD suggested that CL look into the CCRB as a possible mechanism for holding the 28th precinct cops accountable for what they've done to her.	Info-Legal
9/7/2011	SD advised CL that the only real oversight with NYPD comes from IAB (which she's already involved with) and the CCRB.	Info-Legal
9/7/2011	SD advised CL that in cross-complaint cases, credibility is key and the pending criminal case against her puts her at a disadvantage as far as that's concerned.	Info-Legal
9/7/2011	SD informed CL that the first focus should be getting the charges dropped and once that's resolved, then see if it's possible to re-open the assault case against RESP.	Info-Legal
9/7/2011	SD gave CL my card with the LAP HL # on it in case she needs to contact me.	Info-Legal
9/14/2011	SD s/w CL who called in for me at CVTC.	Follow Up
9/14/2011	SD, with Lisa H. @ CVTC, attempted to contact Lisa Callahan @ the Mn DA's office. No answer. Left vm with my direct line and extension to call me back.	CJA-DA
9/14/2011	SD advised CL that b/c of the bureaucratic nature of the system, correcting mistakes like this take an extensive amount of time.	Info-Legal
9/14/2011	CL expressed fear at being incarcerated "for the rest of her life," and SD reminded her that these are all MISD charges and carry a maximum of 1 year.	Info-Legal
9/14/2011	SD advised CL that we tried to call Lisa Callahan at the DA's office, but there was no answer so we left a message asking her to call me back at the office on my extension.	Info-Legal
9/14/2011	SD advised CL that we have a working relationship with the DA's office and will try to utilize that to help her.	Info-Legal
10/14/2011	SD called Lisa @ CVTC to s/w her on CL's behalf about Belinda escorting CL to her appt with a City Council member to discuss her treatment by NYPD and the DA's office. No answer. Left vm.	PA-Legal
10/28/2011	SD s/w CL who called for me on the HL.	Follow Up
10/28/2011	SD offered CL emotional support given her treatment by the police and the DA's office.	Crisis Counseling

Services		
Service Date	Service Notes	Type of Service
10/28/2011	SD advised CL that I can call the precinct to speak with the DVPO who took her rep't on RESP's latest attack (a PO Simmons) and find out what happened w/ the DIR.	Info-Legal
10/28/2011	SD advised CL that both Lisa @ CVTC and I have been trying to get through to the DA's office about getting the charges dropped but we're not getting anywhere on that front.	Info-Legal
10/28/2011	SD advised CL to send me her copy of the DIR and then I can call the 28th precinct to speak with DVPO Simmons about how it was "lost" according to Lt. LaRocca. Gave CL our fax #.	Info-Legal
11/1/2011	SD called the 28th precinct to speak w/ DVPO Simmons about this DIR. She was very resistant and wasn't able to provide any info except that the report got "lost in the system". Her stance was that CL must return to the precinct to file another one.	CJA-Police
11/8/2011	SD s/w CL about Belinda accompanying her to the precinct to make a report as well as to her meeting with Christine Quinn's office to report her treatment by the police.	Info-Legal
11/8/2011	SD offered CL emotional support and validated her feelings about the 28th precinct's handling of her case.	Crisis Counseling
11/8/2011	SD gave CL a run-down of the very unproductive phone call I had with the DVPO last week, and advised her that the issue is definitely not her fault.	Info-Legal
11/8/2011	CL called on the HL and SD s/w her about what happened when I called the 28th precinct last week.	Follow Up
11/8/2011	SD emailed KT & Anindita about having Belinda accompany CL to the 28th precinct to re-file the DIR that they "lost" in their system.	PA-Legal
11/9/2011	SD s/w CL briefly at CVTC about Belinda accompanying her to the 28th precinct. CL was just getting out of group at CVTC.	Follow Up
11/9/2011	SD s/w CL briefly at CVTC about Belinda accompanying her to the 28th precinct. CL was just getting out of group at CVTC.	Info-Legal
11/9/2011	SD provided CL w/ emotional support about her treatment by the 28th and confirmed that I was also stonewalled by the DVPO there.	Crisis Counseling
11/9/2011	SD advised CL that I would meet with Belinda on Friday to go over CL's case with her, so she should be able to accompany her next week.	Info-Legal
11/15/2011	SD called CL to set up a time for Belinda to accompany her to the precinct in order to make a report. No answer. Her voice mail box was full so I couldn't leave a message.	Follow Up
11/15/2011	SD called Lisa @ CVTC to s/w her about CL. No answer. Left vm asking for a call back.	PA-Legal
11/15/2011	SD s/w Lisa @ CVTC who returned my phone call. Discussed the accompaniment to the 28th precinct as well as CL possibly testifying at City Council.	PA-Legal
11/16/2011	SD met with CL at CVTC and briefly discussed Belinda escorting her	Info-Other

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	to the 28th precinct to file her DIR as well as possibly testifying at City Council early next yr.	
11/16/2011	SD met with CL at CVTC and briefly discussed Belinda escorting her to the 28th precinct to file her DIR as well as possibly testifying at City Council early next yr.	Follow Up
11/16/2011	SD met with CL at CVTC and briefly discussed Belinda escorting her to the 28th precinct to file her DIR as well as possibly testifying at City Council early next yr.	Info-Legal
11/22/2011	SD called CVTC to s/w Lisa to let her know that Kelly and Belinda will be meeting at CVTC on Thursday (12/1) to head up to the 28th precinct.	PA-Legal
11/22/2011	BD s/w CL and arranged a date/time to meet @ CVTC and then to go up to the 28th precinct.	Info-Legal
11/22/2011	SD s/w CL who called in on the HL. Let her know that I hadn't been able to get a hold of her and had her s/w Belinda to schedule a time to go to the precinct.	Follow Up
11/22/2011	SD s/w CL who called in on the HL. Let her know that I hadn't been able to get a hold of her and had her s/w Belinda to schedule a time to go to the precinct.	Info-Legal
11/30/2011	SD advised CL that now that her OP was downgraded, it's critical that she obtain the DIR to prove the OP violation to the IDV judge.	Info-Legal
11/30/2011	SD called CL to s/w her about meeting tomorrow w/ BD to head to the 28th precinct.	Follow Up
11/30/2011	SD provided CL emotional support b/c of what occurred in IDV w/ her OP (hers was downgraded to a limited OP and he still has a stay away against her).	Crisis Counseling
11/30/2011	SD s/w CL about what happened in IDV court yesterday w/ her OP.	Info-Legal
11/30/2011	SD s/w CL about the possibility of a City Council hearing and let her know that it's still in the initial stages. I haven't heard anything more about it.	Info-Other
11/30/2011	SD confirmed the time/date for CL to meet with BD and head to the precinct.	Info-Legal
12/1/2011	SD called Lisa @ CVTC to give her an update on what took place today at the 28. No answer. Left vm. Also informed her about my conversation w/ KT and the potential to speak directly to Audrey but we need to be confident that there's nothing that can be used against CL.	PA-Legal
12/1/2011	BD met with CL at CVTC to accompany her to the 28th precinct. BD assisted CL with filing a DIR for the OP violation and emailed SD to inform her of what took place. CL was very happy with the effect of the accompaniment and articulated her desire for BD to accompany her in other respects.	CJA-DA
12/1/2011	SD s/w Lisa who called me back. Discussed CL's case and	PA-

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	possibility of a meeting to try and hash out the probability of going to DA's office with a solid case for dropping the charges. Will speak to KT about this.	Counseling
12/1/2011	SD s/w Lisa who called me back. Discussed CL's case and possibility of a meeting to try and hash out the probability of going to DA's office with a solid case for dropping the charges. Will speak to KT about this.	PA-Legal
12/1/2011	BD met with CL at CVTC to accompany her to the 28th precinct. BD assisted CL with filing a DIR for the OP violation and emailed SD to inform her of what took place. CL was very happy with the effect of the accompaniment and articulated her desire for BD to accompany her in other respects.	CJA-Police
12/1/2011	BD met with CL at CVTC to accompany her to the 28th precinct. BD assisted CL with filing a DIR for the OP violation and emailed SD to inform her of what took place. CL was very happy with the effect of the accompaniment and articulated her desire for BD to accompany her in other respects.	Info-Legal
12/1/2011	BD met with CL at CVTC to accompany her to the 28th precinct. BD assisted CL with filing a DIR for the OP violation and emailed SD to inform her of what took place. CL was very happy with the effect of the accompaniment and articulated her desire for BD to accompany her in other respects.	Follow Up
12/1/2011	BD met with CL at CVTC to accompany her to the 28th precinct. BD assisted CL with filing a DIR for the OP violation and emailed SD to inform her of what took place. CL was very happy with the effect of the accompaniment and articulated her desire for BD to accompany her in other respects.	Crisis Counseling
12/2/2011	SD emailed Lisa to arrange a time for us to meet w/ KT to discuss CL's case and develop a strategy for advocating with the DA's office.	PA-Legal
12/5/2011	SD s/w CL who called in very upset b/c she ran into RESP at the bodega and had to turn around and walk out while they (him and his friend) laughed at her.	Follow Up
12/5/2011	SD s/w CL to try and de-escalate her a bit, and then reminded her that the best thing she can do for now is protect herself from the OP even though it's infuriating.	Crisis Counseling
12/5/2011	SD s/w CL to try and de-escalate her a bit, and then reminded her that the best thing she can do for now is protect herself from the OP even though it's infuriating.	Safety Planning
12/5/2011	SD advised CL that KT and I need to review her papers from court so that we can see what exactly happened there before we can do any kind of advocacy on her behalf. CL will fax them today.	Info-Legal
12/6/2011	SD called CL unblocked to f/u on her vm from yesterday about her fax. It was not in the fax machine. No answer. Left vm.	Follow Up
12/6/2011	SD s/w CL who called in returning my vm. Confirmed for her that I	Info-Legal

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	did not receive the fax (checked again), so she is going to drop it by the office today. I gave her the address.	
12/6/2011	SD called CL unblocked to f/u on her vm from yesterday about her fax. It was not in the fax machine. No answer. Left vm.	Info-Legal
12/6/2011	SD s/w CL who called in returning my vm. Confirmed for her that I did not receive the fax (checked again), so she is going to drop it by the office today. I gave her the address.	Follow Up
12/7/2011	SD and Lisa s/w CL about how her actions, w/o the context of the history of DV against her, could have been seen as a batterer's actions.	Info-Legal
12/7/2011	SD met with CL at CVTC.	CVTC
12/7/2011	SD and Lisa s/w CL about the common tactics batterers use to intimidate their victims, and how some of her actions and statements could be misrepresented to look like those tactics.	Info-Legal
12/7/2011	SD s/w CL about the 28th precinct and their handling of the case.	Info-Legal
12/7/2011	SD provided CL w/ emotional support given the handling of her case to date.	Crisis Counseling
12/7/2011	SD s/w Lisa about CL's case and tried to set up a time for her to meet with KT and I to go over the court doc's in CL's possession and work out a coherent story to possibly present to the DA's office on CL's behalf.	PA-Legal
12/7/2011	SD s/w CL about the DA's office's handling of her case.	Info-Legal
12/8/2011	SD s/w Lisa and KT about setting up a meeting sometime next week.	PA-Legal
12/13/2011	SD tried calling Lisa @ CVTC again to set up a time to meet w/ KT re. CL's legal case. Trying for tomorrow afternoon near the end of the day.	PA-Legal
12/13/2011	SD s/w Lisa who called me back, and we set up the time of 3pm tomorrow to meet w/ KT to review CL's legal case.	PA-Legal
12/20/2011	SD called Lisa returning her message about setting up a time to meet w/ KT re. CL's legal case. No answer. Left vm.	PA-Other
12/20/2011	SD called Lisa returning her message about setting up a time to meet w/ KT re. CL's legal case. No answer. Left vm.	PA-Legal
12/20/2011	SD s/w Lisa @ CVTC and (tentatively) set up a meeting for next week on Wed @ 11 am.	PA-Legal
12/28/2011	SD met w/ Lisa & KT re. CL's case; Family Court OP, Crim Court charges, and proving she's a survivor of DV.	PA-Legal
12/28/2011	KT met w/ Lisa & SD re. CL's case; Family Court OP, Crim Court charges, and proving she's a survivor of DV.	PA-Counseling
12/28/2011	KT met w/ Lisa & SD re. CL's case; Family Court OP, Crim Court charges, and proving she's a survivor of DV.	PA-Legal
12/28/2011	SD met w/ Lisa & KT re. CL's case; Family Court OP, Crim Court	PA-Family

Services		
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	charges, and proving she's a survivor of DV.	Court
12/28/2011	SD met w/ Lisa & KT re. CL's case; Family Court OP, Crim Court charges, and proving she's a survivor of DV.	PA-Counseling
12/28/2011	KT met w/ Lisa & SD re. CL's case; Family Court OP, Crim Court charges, and proving she's a survivor of DV.	PA-Family Court
1/5/2012	KT met with Lisa, SD, and CL to discuss the FC case, the CC charges against her, short and long-term priorities and goals, and forming an effective strategy to address them.	PA-Family Court
1/5/2012	KT met with Lisa, SD, and CL to discuss the FC case, the CC charges against her, short and long-term priorities and goals, and forming an effective strategy to address them.	PA-Legal
1/5/2012	SD met w/ Lisa, KT, and CL to discuss the FC case, the CC charges against her, short and long-term priorities and goals, and forming an effective strategy to address them.	Safety Planning
1/5/2012	KT met with Lisa, SD, and CL to discuss the FC case, the CC charges against her, short and long-term priorities and goals, and forming an effective strategy to address them.	Safety Planning
1/5/2012	KT met with Lisa, SD, and CL to discuss the FC case, the CC charges against her, short and long-term priorities and goals, and forming an effective strategy to address them.	Crisis Counseling
1/5/2012	SD met w/ Lisa, KT, and CL to discuss the FC case, the CC charges against her, short and long-term priorities and goals, and forming an effective strategy to address them.	Crisis Counseling
1/5/2012	SD met w/ Lisa, KT, and CL to discuss the FC case, the CC charges against her, short and long-term priorities and goals, and forming an effective strategy to address them.	PA-Legal
1/5/2012	SD met w/ Lisa, KT, and CL to discuss the FC case, the CC charges against her, short and long-term priorities and goals, and forming an effective strategy to address them.	PA-Family Court
1/5/2012	SD met w/ Lisa, KT, and CL to discuss the FC case, the CC charges against her, short and long-term priorities and goals, and forming an effective strategy to address them.	PA-Counseling
1/5/2012	KT met with Lisa, SD, and CL to discuss the FC case, the CC charges against her, short and long-term priorities and goals, and forming an effective strategy to address them.	PA-Counseling
1/11/2012	SD explained what our strategy will be in advocating with the DA's office and reminded her that while we believe her story, we have to know exactly what took place (whether it was incriminating or not) so that we can lay out the entire context of DV and its impact on her actions.	Info-Legal
1/11/2012	SD s/w CL about the different sub-sections of the aggravated harassment charge that she's facing and what they mean.	Info-Legal
1/11/2012	SD met w/ CL at CVTC to discuss the charges in-depth and to get a	Follow Up

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	full account of her version of events.	
1/11/2012	SD did some emotional, physical, and legal SP w/ CL because he is still calling her and she is talking to him b/c she misses him.	Safety Planning
1/11/2012	SD provided CL w/ emotional support throughout this process.	Crisis Counseling
1/11/2012	SD s/w CL in-depth about her version of events (# of phone calls and texts, what was said, the nature of the interactions w/ him, and her intent during these interactions). Recorded CL's version of events in a timeline format.	PA-Legal
1/12/2012	KT s/w Audrey Moore, Chief of DV Bureau @ NYCo DA's office, to inquire about case and raise issues of victim treated as perp. AM requested email with identifying email; I will follow up with her.	CJA-DA
1/13/2012	SD s/w CL who called in on the HL.	Follow Up
1/13/2012	SD offered CL emotional support b/c of how traumatized she was yesterday over her attorney's conduct.	Crisis Counseling
1/13/2012	SD s/w CL about her decision to fire Kartegener and the possibility of tapping into her resources at the Legal Aid office since she had a good feeling about them.	Info-Legal
1/13/2012	SD s/w CL about what the plea offer could mean for her and that it illustrates a possible problem with the state's case.	Info-Legal
1/13/2012	SD did some SP w/ CL b/c she mentioned just waking up (3:15pm) after taking sleeping pills the night before. She clarified that she didn't try to overdose; she took them just to knock her out.	Safety Planning
1/13/2012	SD called Lisa @ CVTC to update her on the case. No answer. Left vm requesting a call back.	PA-Legal
1/17/2012	SD called for Lisa @ CVTC again returning her vm. No answer. Left vm letting her know what happened w/ ADA since she's meeting with CL at 2pm today and asked her to call me.	PA-Legal
1/19/2012	SD s/w CL who called in on the HL but she hung up when I tried to talk to her about leaving a vm on our phone rather than calling over and over again. I informed her that we can't have someone call incessantly and that I was planning on returning her message when CL got frustrated and hung up the phone.	Follow Up
1/19/2012	KT emailed Audrey Moore and Lisa Haileselassie re: case status and advocating for dismissal.	CJA-DA
1/19/2012	SD s/w Lisa who called in returning my vm. S/w her about CL's case and the upcoming disorderly conduct hearing.	PA-Counseling
1/19/2012	SD sent KT the info for CL's case and the info for RESP who then forwarded that info to Audrey Moore at the DA's office.	CJA-DA
1/19/2012	SD s/w Lisa who called in returning my vm. S/w her about CL's case and the upcoming disorderly conduct hearing.	PA-Legal
1/19/2012	SD s/w CL who called in on the HL but she hung up when I tried to talk to her about leaving a vm on our phone rather than calling over	Info-Legal

Services		
Service Date	Service Notes	Type of Service
	and over again. I informed her that we can't have someone call incessantly and that I was planning on returning her message when CL got frustrated and hung up the phone.	
1/19/2012	SD called Lisa @ CVTC back returning her vm from earlier today. No answer. Left a detailed vm about CL as well as about the other HL case they were helping us with.	PA-Legal
1/20/2012	SD s/w CL who called in on the HL about yesterday's conversation.	Follow Up
1/20/2012	SD gave CL emotional support in response to her anxiety over the criminal charges against her.	Crisis Counseling
1/20/2012	SD s/w CL about the criminal charges pending against her and the upcoming hearing on the disorderly conduct case.	Info-Legal
1/24/2012	SD s/w CL who called in on the HL w/ an update on the disorderly conduct case. ADA Wells offered an ACD, but she did not accept.	Info-Legal
1/24/2012	SD s/w CL who called in on the HL w/ an update on the disorderly conduct case. ADA Wells offered an ACD, but she did not accept.	Follow Up
1/31/2012	SD informed CL that we gave her info and the info of the case to the SVB chief (Audrey Moore) in the DA's office a couple weeks ago and we're still waiting on the outcome of that.	Info-Legal
1/31/2012	SD informed CL that even one missed court date can result in a dismissal of her FC case against RESP, which is what happened. However, she didn't show b/c Kartegener told her the wrong date and they've given her until Mon to come back w/ a new attorney.	Info-Legal
1/31/2012	SD informed CL that if ADA Wells knew she wasn't going to take the deal, then he didn't have to formally offer it to her (it sounds like he did not).	Info-Legal
1/31/2012	SD s/w CL who called in on the HL very upset and threatening to "go to the Bk Bridge" right now (basically providing an underlying implication of suicidality).	Crisis Counseling
1/31/2012	SD s/w CL who called in on the HL very upset and threatening to "go to the Bk Bridge" right now (basically providing an underlying implication of suicidality).	Follow Up
2/3/2012	SD s/w CL who called in on the HL about the pending crim charges. Wanted to know what we "sent" to the DA's office and I informed her that we only provided her name and the docket # of the case b/c that's all they wanted.	Follow Up
2/3/2012	SD s/w CL who called in on the HL about the pending crim charges. Wanted to know what we "sent" to the DA's office and I informed her that we only provided her name and the docket # of the case b/c that's all they wanted.	Info-Legal
2/3/2012	SD confirmed w/ CL that it would still be okay to present what she gave us to the DA's office if they ask for it. She said that was fine.	Info-Legal
2/6/2012	SD called Lisa @ CVTC back returning her call re. status of CL's case and advocacy with DA's office.	PA-Legal

Services		
Service Date	Service Notes	Type of Service
2/6/2012	SD s/w CL who called in to update me on the case.	Follow Up
2/6/2012	SD s/w CL about the pending crim case and her new Legal Aid attorney.	Info-Legal
2/6/2012	SD s/w CL about meeting w/ her Legal Aid attorney. Will discuss w/ KT and see if there is an appropriate meeting time this week (may not be possible this week).	Info-Legal
2/7/2012	SD responded to CL's email w/ corrected count info, docket #'s, and an explanation of what an ACD is for her formal complaint about the DA's office.	Info-Legal
2/7/2012	SD s/w Lisa who called re. the pending criminal charges and case developments. Lisa will be seeing CL later today for a counseling session.	PA-Counseling
2/7/2012	SD responded to CL's email w/ corrected count info, docket #'s, and an explanation of what an ACD is for her formal complaint about the DA's office.	Info-Legal
2/7/2012	SD responded to CL's email w/ corrected count info, docket #'s, and an explanation of what an ACD is for her formal complaint about the DA's office.	Info-Legal
2/7/2012	SD responded to CL's email w/ corrected count info, docket #'s, and an explanation of what an ACD is for her formal complaint about the DA's office.	Follow Up
2/7/2012	SD s/w Lisa who called re. the pending criminal charges and case developments. Lisa will be seeing CL later today for a counseling session.	PA-Legal
2/7/2012	SD informed CL that Lisa @ CVTC called me re. updates on the case and that she's prob concerned about that.	Info-Counseling
2/7/2012	SD provided CL my email address b/c she would like me to look over the formal complaint she's going to write about the DA's office's handling of her case. I agreed to look at it.	Info-Legal
2/7/2012	SD informed CL that her theory as to overall office responsibility may not be true; it's highly unlikely the entire DA's office is involved (as opposed to ADA Stroben and/or Wells).	Info-Legal
2/7/2012	SD s/w CL who called in on the HL w/ an update on the case. Her neighbor is on the community board with an inspector at the 28th, and the neighbor asked him what was going on w/ CL's case. The inspector allegedly stated that it was all the DA's office.	Follow Up
2/7/2012	SD provided CL w/ emotional support re. the new info she's rec'd about the DA's office's conduct in her case (according to an inspector at the 28th precinct that is).	Crisis Counseling
2/8/2012	KT emailed Lisa Haileselassie and SD re: conversation with defense attorney and gathering evidence, developing plan for crisis management, reporting on performance in court, etc.	PA-Counseling
2/8/2012	KT emailed Tajuana Johnson w/ same info	PA-Legal

Services		
Service Date	Service Notes	Type of Service
2/8/2012	KT emailed Lisa Haileselassie and SD re: conversation with defense attorney and gathering evidence, developing plan for crisis management, reporting on performance in court, etc.	PA-Legal
2/8/2012	KT called Tajuana Johnson, CL's new defense attorney at Legal Aid, and left message advising of who I am and my role in case.	PA-Legal
2/8/2012	KT emailed Tajuana Johnson w/ same info	CJA-Other
2/8/2012	KT called Tajuana Johnson, CL's new defense attorney, and discussed situation briefly. Discussed our role and the ways we can support. She is interested in our working with Kelly to prepare documents re: her victimization. I will reach out to SD and LH re: preparing this evidence.	CJA-Other
2/8/2012	KT called Tajuana Johnson, CL's new defense attorney at Legal Aid, and left message advising of who I am and my role in case.	CJA-Other
2/15/2012	SD met w/ CL briefly at CVTC re. doc's to bring to Friday's meeting w/ Tajuana (e.g. records from glass companies, medical records from incidents identified on her timeline, etc.). CL stated that she's scared about the trial and I validated her feelings about that.	Follow Up
2/15/2012	SD met w/ CL briefly at CVTC re. doc's to bring to Friday's meeting w/ Tajuana (e.g. records from glass companies, medical records from incidents identified on her timeline, etc.). CL stated that she's scared about the trial and I validated her feelings about that.	Info-Legal
2/15/2012	SD met w/ CL briefly at CVTC re. doc's to bring to Friday's meeting w/ Tajuana (e.g. records from glass companies, medical records from incidents identified on her timeline, etc.). CL stated that she's scared about the trial and I validated her feelings about that.	Crisis Counseling
2/16/2012	SD called CL to remind her to bring the doctor's reports and receipts from the glass companies tomorrow. No answer. Left vm and also emailed CL w/ the same request.	Follow Up
2/16/2012	SD called CL to remind her to bring the doctor's reports and receipts from the glass companies tomorrow. No answer. Left vm and also emailed CL w/ the same request.	Info-Legal
2/17/2012	KT met w/ Lisa Haileselassie, Tajuana Johnson and CL to discuss criminal case. Discussed strategy, prospects, useful ways to prepare.	Follow Up
2/17/2012	KT met w/ Lisa Haileselassie, Tajuana Johnson and CL to discuss criminal case. Discussed strategy, prospects, ACD v. dismissal, useful ways to prepare.	Safety Planning
2/17/2012	KT met w/ Lisa Haileselassie, Tajuana Johnson and CL to discuss criminal case. Discussed strategy, prospects, useful ways to prepare.	PA-Legal
2/17/2012	KT met w/ Lisa Haileselassie and Tajuana Johnson to discuss case. Discussed outlook, position of prosecutor, attorney's impression of defense issues. Discussed ways we can assist, victimization, etc.	PA-Legal
2/17/2012	KT met w/ Lisa Haileselassie and Tajuana Johnson to discuss case.	Safety

Services		
ServiceDate	Service Notes	Type of Service
	Discussed outlook, position of prosecutor, attorney's impression of defense issues. Discussed ways we can assist, victimization, bottom lines for CL re: safety and autonomy.	Planning
2/17/2012	KT met w/ Lisa Haileselassie and Tajuana Johnson to discuss case. Discussed outlook, position of prosecutor, attorney's impression of defense issues. Discussed ways we can assist, victimization, etc.	CJA-Other
2/17/2012	KT met w/ Lisa Haileselassie, Tajuana Johnson and CL to discuss criminal case. Discussed strategy, prospects, useful ways to prepare.	CJA-Other
2/24/2012	KT met w/ CL and defense atty Tajuana Johnson. Discussed history of abuse and clarified facts from timeline. Discussed current charges against her and potential outcomes. KT and CL listened in to TJ's phone call with ADA Wells. They have a recording of the OP violation and therefore TJ feels she will not be offered lower than a Family ACD. Discussed future recourse for injustice of dropping charges against her. TJ offered to help bring a case against prosecutor for abuse of discretion. CL very upset at prospects and will consider whether to accept ACD. TJ advised she intends to do a full investigation. We will support however we can.	Crisis Counseling
2/24/2012	KT met w/ CL and defense atty Tajuana Johnson. Discussed history of abuse and clarified facts from timeline. Discussed current charges against her and potential outcomes. KT and CL listened in to TJ's phone call with ADA Wells. They have a recording of the OP violation and therefore TJ feels she will not be offered lower than a Family ACD. Discussed future recourse for injustice of dropping charges against her. TJ offered to help bring a case against prosecutor for abuse of discretion. CL very upset at prospects and will consider whether to accept ACD. TJ advised she intends to do a full investigation. We will support however we can. Discussed safety issues while she remains living next door to perp w/o an active order, which was dismissed 1/31/12.	Safety Planning
2/24/2012	KT met w/ CL and defense atty Tajuana Johnson. Discussed history of abuse and clarified facts from timeline. Discussed current charges against her and potential outcomes. KT and CL listened in to TJ's phone call with ADA Wells. They have a recording of the OP violation and therefore TJ feels she will not be offered lower than a Family ACD. Discussed future recourse for injustice of dropping charges against her. TJ offered to help bring a case against prosecutor for abuse of discretion. CL very upset at prospects and will consider whether to accept ACD. TJ advised she intends to do a full investigation. We will support however we can.	Follow Up
2/24/2012	KT met w/ CL and defense atty Tajuana Johnson. Discussed history of abuse and clarified facts from timeline. Discussed current charges against her and potential outcomes. KT and CL listened in to TJ's phone call with ADA Wells. They have a recording of the OP violation and therefore TJ feels she will not be offered lower than a	CJA-Other

Services		
Service Date	Service Notes	Type of Service
	Family ACD. Discussed future recourse for injustice of dropping charges against her. TJ offered to help bring a case against prosecutor for abuse of discretion. CL very upset at prospects and will consider whether to accept ACD. TJ advised she intends to do a full investigation. We will support however we can.	
2/24/2012	KT met w/ CL and defense atty Tajuana Johnson. Discussed history of abuse and clarified facts from timeline. Discussed current charges against her and potential outcomes. KT and CL listened in to TJ's phone call with ADA Wells. They have a recording of the OP violation and therefore TJ feels she will not be offered lower than a Family ACD. Discussed future recourse for injustice of dropping charges against her. TJ offered to help bring a case against prosecutor for abuse of discretion. CL very upset at prospects and will consider whether to accept ACD. TJ advised she intends to do a full investigation. We will support however we can.	PA-Legal
2/24/2012	KT met w/ CL and defense atty Tajuana Johnson. Discussed history of abuse and clarified facts from timeline. Discussed current charges against her and potential outcomes. KT and CL listened in to TJ's phone call with ADA Wells. They have a recording of the OP violation and therefore TJ feels she will not be offered lower than a Family ACD. Discussed future recourse for injustice of dropping charges against her. TJ offered to help bring a case against prosecutor for abuse of discretion. CL very upset at prospects and will consider whether to accept ACD. TJ advised she intends to do a full investigation. We will support however we can.	Info-Legal
2/24/2012	Discussed right to file for another OP if necessary.	Info-Family Court
2/27/2012	SD informed CL that I don't know how this is all going to play out, but that the ADA has to prove that she had the intent to commit the crimes she's charged with.	Info-Legal
2/27/2012	SD advised CL to take her cues from Tajuana and to let her handle the case.	Info-Legal
2/27/2012	SD s/w CL briefly but I had not spoken to KT yet about the meeting they all had on Friday (I was out of town). Provided her w/ some emotional support and also discussed the statements the ADA apparently made to Tajuana.	Info-Legal
2/27/2012	SD s/w CL briefly but I had not spoken to KT yet about the meeting they all had on Friday (I was out of town). Provided her w/ some emotional support and also discussed the statements the ADA apparently made to Tajuana.	Follow Up
2/27/2012	SD s/w CL briefly but I had not spoken to KT yet about the meeting they all had on Friday (I was out of town). Provided her w/ some emotional support and also discussed the statements the ADA apparently made to Tajuana.	Crisis Counseling
3/2/2012	SD s/w CL who called in scared about the hearing on Tuesday. SD	Crisis

Services		
Service Date	Service Notes	Type of Service
	offered emotional support.	Counseling
3/2/2012	SD s/w CL who called back to ask about the ACD and her ability to sue after the 1 yr time period is up. I confirmed what both KT and Tajuana told her about this on Friday.	Info-Legal
3/2/2012	SD s/w CL who called back to ask about the ACD and her ability to sue after the 1 yr time period is up. I confirmed what both KT and Tajuana told her about this on Friday.	Follow Up
3/2/2012	SD s/w Lisa @ CVTC about my conversation w/ CL earlier today. Let her know that CL was pretty upset, but I was able to talk her down.	PA-Counseling
3/2/2012	SD s/w Lisa @ CVTC who returned my call. Discussed the hearing on Tuesday and the fact that she might not be able to go. Also discussed the 30/30, which is a no go b/c Kartegener did ask for an adjournment.	PA-Legal
3/2/2012	SD informed CL that I have no idea who the "phone expert" the ADA mentioned to Tajuana would be, but that Raheem has to confirm to the court that the phone call came from CL on the alleged date after the OP was issued.	Info-Legal
3/2/2012	SD s/w CL about Raheem showing up at the hearing on Tuesday to vet the phone call for the contempt of court charge, and CL reiterated that he won't be there.	Info-Legal
3/2/2012	SD informed CL that the ADA has to prove 3 things: 1) that she committed the crime, 2) that she had the intent to commit the crime, and 3) these two things beyond a reasonable doubt.	Info-Legal
3/2/2012	SD s/w CL who called in scared about the hearing on Tuesday. SD offered emotional support.	Follow Up
3/2/2012	SD informed CL that if this goes to trial, the ADA has to provide his evidence to Tajuana who will have the opportunity to investigate all of it.	Info-Legal
3/6/2012	SD s/w CL after hearing and advised her that it's essential that she listen to and trust Tajuana's actions in court. Confirmed what Tajuana told her after court about how to act when in front of the judge, and to let her make the plays.	Crisis Counseling
3/6/2012	SD s/w CL after hearing and informed her that when Tajuana checked the calendar, she found that Kartegener had agreed to each adjournment, so today is the first day of the 30/30 clock. This is why she needs to let Tajuana control what's happening in court (she was trying to push the next hearing back into April to run down the clock).	Info-Legal
3/6/2012	SD went to IDV w/ Tajuana, Rammel (from CVTC), and CL for criminal trial hearing. People weren't ready. 30/30 time started. Adjourned until 3/15/12.	PA-Legal
3/6/2012	SD s/w CL after hearing and advised her that it's essential that she listen to and trust Tajuana's actions in court. Confirmed what	Info-Legal

Services		
Service Date	Service Notes	Type of Service
	Tajuana told her after court about how to act when in front of the judge, and to let her make the plays.	
3/6/2012	SD s/w CL after hearing about the trajectory of the case over the past year from 300+ charges to an ACD to now not being ready when Tajuana indicated she is ready.	Info-Legal
3/6/2012	SD went to IDV w/ Tajuana, Rammel (from CVTC), and CL for criminal trial hearing. People weren't ready. 30/30 time started. Adjourned until 3/15/12.	CJA-DA
3/6/2012	SD went to IDV w/ Tajuana, Rammel (from CVTC), and CL for criminal trial hearing. People weren't ready. 30/30 time started. Adjourned until 3/15/12.	PA-Counseling
3/8/2012	KT s/w Tajuana, CL's defense attorney. Discussed issues with the case, potential responses to assist with the criminal charges.	PA-Legal
3/9/2012	KT s/w CL and discussed what happened in court. Discussed straying from plan, CL's concerns with prosecution, etc. Did CC.	Follow Up
3/9/2012	KT s/w CL and discussed what happened in court. Discussed straying from plan, CL's concerns with prosecution, etc. Did CC.	Crisis Counseling
3/9/2012	KT s/w CL and discussed what happened in court. Discussed straying from plan, CL's concerns with prosecution, etc. Did CC.	Info-Legal
3/13/2012	KT s/w CL's social worker Lisa Haileselassie and discussed case. Discussed mental health issues and appropriate responses. Discussed ways to assist CL's attorney.	PA-Counseling
3/13/2012	KT s/w CL's social worker Lisa Haileselassie and discussed case. Discussed mental health issues and appropriate responses. Discussed ways to assist CL's attorney.	CVTC
3/13/2012	KT s/w CL's social worker Lisa Haileselassie and discussed case. Discussed mental health issues and appropriate responses. Discussed ways to assist CL's attorney.	PA-Legal
3/14/2012	KT met w/ CL and Tajuana Johnson; discussed cases. Discussed defense for violation as well as disorderly conduct. Discussed issues with presentation in court, how to manage abusive and manipulative tactics by abuser, how to stay safe during process. Did CC w/ CL as she was extremely distressed by the conversation. Discussed plan for upcoming court	Crisis Counseling
3/14/2012	KT met w/ CL and Tajuana Johnson; discussed cases. Discussed defense for violation as well as disorderly conduct. Discussed issues with presentation in court, how to manage abusive and manipulative tactics by abuser, how to stay safe during process. Did CC w/ CL as she was extremely distressed by the conversation. Discussed plan for upcoming court	Info-Legal
3/14/2012	KT met w/ CL and Tajuana Johnson; discussed cases. Discussed defense for violation as well as disorderly conduct. Discussed issues with presentation in court, how to manage abusive and manipulative tactics by abuser, how to stay safe during process. Did CC w/ CL as	PA-Legal

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	she was extremely distressed by the conversation. Discussed plan for upcoming court	
3/14/2012	KT met w/ CL and Tajuana Johnson; discussed cases. Discussed defense for violation as well as disorderly conduct. Discussed issues with presentation in court, how to manage abusive and manipulative tactics by abuser, how to stay safe during process. Did CC w/ CL as she was extremely distressed by the conversation. Discussed plan for upcoming court	Safety Planning
3/14/2012	KT met w/ CL and Tajuana Johnson; discussed cases. Discussed defense for violation as well as disorderly conduct. Discussed issues with presentation in court, how to manage abusive and manipulative tactics by abuser, how to stay safe during process. Did CC w/ CL as she was extremely distressed by the conversation. Discussed plan for upcoming court	Follow Up
3/14/2012	KT met w/ CL and Tajuana Johnson; discussed cases. Discussed defense for violation as well as disorderly conduct. Discussed issues with presentation in court, how to manage abusive and manipulative tactics by abuser, how to stay safe during process. Did CC w/ CL as she was extremely distressed by the conversation. Discussed plan for upcoming court	CJA-Other
3/15/2012	KT s/w CL who reported on court case. Raheem did not show up in court again. Prosecutor requested an adjournment on the case and advised he still needed more time. CL distressed by the extension of the case but understood the legal strategy.	Follow Up
3/15/2012	KT s/w CL who reported on court case. Raheem did not show up in court again. Prosecutor requested an adjournment on the case and advised he still needed more time. CL distressed by the extension of the case but understood the legal strategy.	Crisis Counseling
3/15/2012	KT s/w CL who reported on court case. Raheem did not show up in court again. Prosecutor requested an adjournment on the case and advised he still needed more time. CL distressed by the extension of the case but understood the legal strategy.	Info-Legal
3/21/2012	KT s/w CL and discussed upcoming court. She spoke with her defense attorney who wants her to begin collecting evidence. Atty said she does not want to flush out the case before seeing what the prosecutor has. CL and I discussed abuse issues and her efforts to try to keep the situation under wraps. Did safety planning and discussed strategy for getting protection once this is over. CL became very distressed during the conversation and I tried to calm her down a little bit. She is very worried about the ways her abuser will use this against her in the future.	Info-Legal
3/21/2012	KT s/w CL and discussed upcoming court. She spoke with her defense attorney who wants her to begin collecting evidence. Atty said she does not want to flush out the case before seeing what the prosecutor has. CL and I discussed abuse issues and her efforts to	Safety Planning

Services		
Service Date	Service Notes	Type of Service
	try to keep the situation under wraps. Did safety planning and discussed strategy for getting protection once this is over. CL became very distressed during the conversation and I tried to calm her down a little bit. She is very worried about the ways her abuser will use this against her in the future.	
3/21/2012	KT s/w CL and discussed upcoming court. She spoke with her defense attorney who wants her to begin collecting evidence. Atty said she does not want to flush out the case before seeing what the prosecutor has. CL and I discussed abuse issues and her efforts to try to keep the situation under wraps. Did safety planning and discussed strategy for getting protection once this is over. CL became very distressed during the conversation and I tried to calm her down a little bit. She is very worried about the ways her abuser will use this against her in the future.	Follow Up
3/21/2012	KT s/w CL and discussed upcoming court. She spoke with her defense attorney who wants her to begin collecting evidence. Atty said she does not want to flush out the case before seeing what the prosecutor has. CL and I discussed abuse issues and her efforts to try to keep the situation under wraps. Did safety planning and discussed strategy for getting protection once this is over. CL became very distressed during the conversation and I tried to calm her down a little bit. She is very worried about the ways her abuser will use this against her in the future.	Crisis Counseling
3/26/2012	KT s/w CL and discussed that I could not attend Monday's meeting. CL understood. CL stated that she was receiving messages on her "Kelly Price" phone line from a blocked number and she believed it was Kenya Wells calling her. CL stated that the called said sexually explicit things and was harassing her. She has received repeated messages from this number. CL was very upset. Did a little CC. Discussed legal strategy and our potential role - will help to gather documents as her defense attorney sees fit.	Follow Up
3/26/2012	KT s/w CL and discussed that I could not attend Monday's meeting. CL understood. CL stated that she was receiving messages on her "Kelly Price" phone line from a blocked number and she believed it was Kenya Wells calling her. CL stated that the called said sexually explicit things and was harassing her. She has received repeated messages from this number. CL was very upset. Did a little CC. Discussed legal strategy and our potential role - will help to gather documents as her defense attorney sees fit.	Crisis Counseling
3/26/2012	KT s/w CL and discussed that I could not attend Monday's meeting. CL understood. CL stated that she was receiving messages on her "Kelly Price" phone line from a blocked number and she believed it was Kenya Wells calling her. CL stated that the called said sexually explicit things and was harassing her. She has received repeated messages from this number. CL was very upset. Did a little CC. Discussed legal strategy and our potential role - will help to gather	Info-Legal

Services		
ServiceDate	Service Notes	Type of Service
	documents as her defense attorney sees fit.	
4/3/2012	SD s/w CL who called in with an update on court today. ADA announced he wasn't ready, and the case was adjourned until 5/23/12. Discussed with CL that WebCrimis won't be reliable for counting days b/c it's dependent on the judge's calendar. CL requested call back from KT.	Follow Up
4/3/2012	SD s/w CL who called in with an update on court today. ADA announced he wasn't ready, and the case was adjourned until 5/23/12. Discussed with CL that WebCrimis won't be reliable for counting days b/c it's dependent on the judge's calendar. CL requested call back from KT.	Crisis Counseling
4/3/2012	SD s/w CL who called in with an update on court today. ADA announced he wasn't ready, and the case was adjourned until 5/23/12. Discussed with CL that WebCrimis won't be reliable for counting days b/c it's dependent on the judge's calendar. CL requested call back from KT.	Info-Legal
4/3/2012	KT called back CL	Follow Up
4/3/2012	KT rec'd message from CL	Follow Up
4/4/2012	SD consulted w/ Lisa at CVTC after s/w CL the day before re. charges pending against CL, CL working w/ her attorney instead of around her, and how CL is coping with everything.	PA-Legal
4/4/2012	SD consulted w/ Lisa at CVTC after s/w CL the day before re. charges pending against CL, CL working w/ her attorney instead of around her, and how CL is coping with everything.	PA-Counseling
4/4/2012	KT s/w CL and made plans for meeting with attorney - scheduled tentatively for next week.	Follow Up
4/4/2012	KT left message for CL	Follow Up
4/4/2012	KT s/w CL and made plans for meeting with attorney - scheduled tentatively for next week.	Info-Legal
4/16/2012	KT rec'd message from CL inquiring about date of appointment	Follow Up
4/16/2012	KT l/m for CL advising of appointment tomorrow at 4	Follow Up
4/16/2012	KT l/m for CL advising of appointment tomorrow at 4	Info-Legal
4/16/2012	KT emailed CL's attorney to confirm appointment time	CJA-Other
4/16/2012	KT rec'd response from CL's attorney advising she was out of town and would check upon return	CJA-Other
4/17/2012	KT rec'd message from CL confirming appt	Follow Up
4/17/2012	KT left message for CL confirming appt.	Follow Up
4/17/2012	KT rec'd email from CL's attorney advising she can still meet at 4 today if CL is available.	CJA-Other
4/30/2012	KT s/w CL and discussed housing court issues. Discussed eviction process and strategies to respond. CL stated she has retained records and we discussed requesting a summary of allegations and	Crisis Counseling

Services		
Service Date	Service Notes	Type of Service
	responding in turn to each with the evidence she has.	
4/30/2012	KT s/w CL and discussed housing court issues. Discussed eviction process and strategies to respond. CL stated she has retained records and we discussed requesting a summary of allegations and responding in turn to each with the evidence she has.	Info-Housing
4/30/2012	Discussed pending criminal case and meeting - will meet tomorrow at 4 with attorney.	CJA-Other
4/30/2012	KT s/w CL and discussed housing court issues. Discussed eviction process and strategies to respond. CL stated she has retained records and we discussed requesting a summary of allegations and responding in turn to each with the evidence she has.	Follow Up
5/1/2012	KT attended meeting with CL at CL's attorneys office. Discussed collection of evidence to establish victimization. Discussed evidentiary issues, legal relevance, defenses. Discussed issues with prosecutorial misconduct - failure to pursue witnesses, etc.	Crisis Counseling
5/1/2012	KT attended meeting with CL at CL's attorneys office. Discussed collection of evidence to establish victimization. Discussed evidentiary issues, legal relevance, defenses. Discussed issues with prosecutorial misconduct - failure to pursue witnesses, etc.	PA-Legal
5/1/2012	KT attended meeting with CL at CL's attorneys office. Discussed collection of evidence to establish victimization. Discussed evidentiary issues, legal relevance, defenses. Discussed issues with prosecutorial misconduct - failure to pursue witnesses, etc.	Safety Planning
5/1/2012	KT attended meeting with CL at CL's attorneys office. Discussed collection of evidence to establish victimization. Discussed evidentiary issues, legal relevance, defenses. Discussed issues with prosecutorial misconduct - failure to pursue witnesses, etc.	Follow Up
5/1/2012	KT attended meeting with CL at CL's attorneys office. Discussed collection of evidence to establish victimization. Discussed evidentiary issues, legal relevance, defenses. Discussed issues with prosecutorial misconduct - failure to pursue witnesses, etc.	CJA-Other
5/4/2012	KT left message for CL re: evidence collecting.	Follow Up
5/4/2012	MM left message for CL. To collect more info on issues on case.	Follow Up
5/16/2012	KT emailed CL's attorney re: criminal case and evidence collecting.	CJA-Other
5/16/2012	KT rec'd response from CL's attorney advising no progress had been made.	CJA-Other
5/22/2012	KT rec'd email from CL's attorney advising that the 30-30 deadline had run out according to her information.	CJA-Other
5/22/2012	KT replied to CL's attorney via email.	CJA-Other
5/24/2012	SD s/w CL again who called back to say that she was able to find the case on WebCrim. I tried again and found it too. Case continued to 6/6/12. Verified to CL that I could find it, and suggested that I probably couldn't find it this morning b/c the site hadn't updated	Follow Up

Services		
Service Date	Service Notes	Type of Service
	yet.	
5/24/2012	SD called Lisa @ CVTC to verify the charges were dropped. No answer. Left vm.	PA-Legal
5/24/2012	SD s/w CL again who called back to say that she was able to find the case on WebCrim. I tried again and found it too. Case continued to 6/6/12. Verified to CL that I could find it, and suggested that I probably couldn't find it this morning b/c the site hadn't updated yet.	Crisis Counseling
5/24/2012	SD s/w CL again who called back to say that she was able to find the case on WebCrim. I tried again and found it too. Case continued to 6/6/12. Verified to CL that I could find it, and suggested that I probably couldn't find it this morning b/c the site hadn't updated yet.	Info-Legal
5/24/2012	SD s/w CL who called in about what happened in the hearing yesterday. Informed her of what I told Lisa about the WebCrim info, but also that this doesn't mean the case was dismissed. It's possible the website hasn't been updated yet; however, it sounds like the case is about to be dismissed based on what happened in yesterday's hearing.	Follow Up
5/24/2012	SD s/w CL who called in about what happened in the hearing yesterday. Informed her of what I told Lisa about the WebCrim info, but also that this doesn't mean the case was dismissed. It's possible the website hasn't been updated yet; however, it sounds like the case is about to be dismissed based on what happened in yesterday's hearing.	Info-Legal
5/24/2012	SD s/w CL who called in about what happened in the hearing yesterday. Informed her of what I told Lisa about the WebCrim info, but also that this doesn't mean the case was dismissed. It's possible the website hasn't been updated yet; however, it sounds like the case is about to be dismissed based on what happened in yesterday's hearing.	Crisis Counseling
5/29/2012	KT s/w CL and discussed court case. She believes that her case will be dismissed based on speedy trial requirements. CL's attorney will file a motion to dismiss on that basis. Explained to CL that once the motion to dismiss is filed the prosecutor will have the opportunity to reply and the cas	
5/30/2012	SD s/w CL briefly at CVTC and discussed the CC case. CL believes the case will be dropped b/c her attorney assured she would file the motion to dismiss. Advised CL to be patient and follow her attorney's lead.	Crisis Counseling
5/30/2012	SD s/w CL briefly at CVTC and discussed the CC case. CL believes the case will be dropped b/c her attorney assured she would file the motion to dismiss. Advised CL to be patient and follow her attorney's lead.	Info-Legal
5/30/2012	SD s/w CL briefly at CVTC and discussed the CC case. CL believes	Follow Up

Services		
Service Date	Service Notes	Type of Service
	the case will be dropped b/c her attorney assured she would file the motion to dismiss. Advised CL to be patient and follow her attorney's lead.	
5/31/2012	SD informed CL that in regards to getting her bail back, she will need ID but she should also discuss that w/ Tajuana to get a better idea of how that will all work out.	Info-Legal
5/31/2012	SD s/w CL who called back returning my vm. She said that Tajuana filed the motion to dismiss today, and is trying to get a clerk to look at it today (she's unsure if she can pull that off). CL will keep us posted.	Follow Up
5/31/2012	SD called CL back returning her messages from this morning. No answer. Left vm.	Follow Up
6/6/2012	KT emailed CL's attorney in response.	CJA-Other
6/6/2012	KT called CL and left message advising atty was aware of situation.	Follow Up
6/6/2012	KT rec'd email from atty advising she had heard the case got called and re: CL's reaction.	CJA-Other
6/6/2012	KT emailed CL's attorney to see where she was.	CJA-Other
6/6/2012	KT s/w CL who called in crisis. Her attorney was late to court and the judge called the case, knowing she was not present. The case got adjourned for two months. CL is very fearful of what will happen and stressed over trying to manage this case and the pressure from Raheem. Discussed options; she is considering trying to fire Tajuana and represent herself today so that the hearing will be heard.	Info-Other
6/6/2012	KT s/w CL who called in crisis. Her attorney was late to court and the judge called the case, knowing she was not present. The case got adjourned for two months. CL is very fearful of what will happen and stressed over trying to manage this case and the pressure from Raheem. Discussed options; she is considering trying to fire Tajuana and represent herself today so that the hearing will be heard.	Info-Legal
6/6/2012	KT s/w CL who called in crisis. Her attorney was late to court and the judge called the case, knowing she was not present. The case got adjourned for two months. CL is very fearful of what will happen and stressed over trying to manage this case and the pressure from Raheem. Discussed options; she is considering trying to fire Tajuana and represent herself today so that the hearing will be heard.	Crisis Counseling
6/6/2012	KT s/w CL who called in crisis. Her attorney was late to court and the judge called the case, knowing she was not present. The case got adjourned for two months. CL is very fearful of what will happen and stressed over trying to manage this case and the pressure from Raheem. Discussed options; she is considering trying to fire Tajuana and represent herself today so that the hearing will be heard.	Follow Up
6/6/2012	KT called CL and left message advising atty was aware of situation.	Info-Legal
6/13/2012	SD explained that if her defense attorney had known about the cert. of readiness, then the mixup over what time the hearing was at	Info-Legal

EXHIBIT #4

cogneurosociety.org

The Neuroscience of Trauma from Sexual Assault

Imunoz

“I believe that you believe something happened to you.” The young woman repeated the detective’s statement to me again. It had been the detective’s response to her question of whether he believed her account of the brutal sexual assault she had experienced the past weekend.

As a counselor on the local rape crisis hotline, it was not the first time I had heard such a demoralizing story of an individual’s attempt to report sexual violence to law enforcement. Because her story had been disjointed, and she had stumbled over several sections of it, the detective had thought that she was confabulating, creating a crime where none had occurred.

When I hear of this dynamic, my thoughts often turn to the neuroscience of trauma. The brain’s response to trauma is complex, and human behavior in response to trauma, particularly sexual violence, is not well-understood but recent research does offer some important insights.

The rate of false report in sexual violence is actually low, estimated by most studies to be around [7%](#) (to compare, this is considerably lower than the [rate of insurance fraud](#)). Moreover, research shows that sexual violence is in fact underreported: Many more incidents of violence occur than are reported to law enforcement or other legal authorities. [Studies](#) show that there are many factors that may predict whether an individual will report, including level of acquaintance with the perpetrator and whether alcohol was consumed.

Taken together, research findings on the factually low rate of false report and on the underreporting of the crime itself demonstrate a clear contradiction in people’s conceptions of sexual violence and that violence in reality. There is a mismatch between media portrayals of “ideal victims”- young, sober women attacked at knifepoint in parking lots at night – and research on real-world victims- nearly [three quarters of whom know the perpetrator](#) (rising to nearly [90% on college campuses](#)) and only 7% of whom were attacked with a firearm, knife, or other weapon.

This kind of misunderstanding of an individual’s experience of sexual assault is heartbreakingly common. A high school student’s report of sexual assault was viewed skeptically by an [elected lawmaker](#), who stated on the public record that “some girls, they rape so easy.” More recently, a [fan base](#) made it clear that it did not believe a woman accusing a sports hero of rape, and that she was making the story up for attention.

Why are victims so often not believed? A large amount of this disbelief may be linked to the behavioral patterns of victims themselves, which can vary widely from case to case and often include behaviors of which the average police detective would be skeptical. To understand these

patterns, it is helpful to look at how the brain and body respond to stress and trauma, such as that experienced during sexual violence.

A relatively new area of the literature on human response to trauma, particularly the trauma experienced during sexual violence, is that of “tonic immobility.” Defined as self-paralysis, or as the inability to move even when not forcibly restrained, tonic immobility has long been studied in non-human animals as the “freeze” response to extreme stress. Recently, it has been [observed in the laboratory](#) as a stress response in humans, as well. This finding explains the reaction of many victims of sexual violence, who report that they felt like they could not escape, even when no weapon was present.

Additionally, due to an entire cascade of hormonal changes, which includes oxytocin and opiates, associated with pain management, adrenaline, commonly associated with “fight or flight,” and cortisol, functional connectivity between different areas of the brain [is affected](#). In particular, this situation affects pathways important for memory formation, which means that an individual can fail to correctly encode and store memories experienced during trauma. While an individual generally will remember the traumatic event itself (unless alcohol or drugs are present in the system), these memories will feel fragmented, and may take time to piece together in a way that makes narrative sense.

Behavioral patterns in individuals who have experienced sexual violence mirror those seen in other traumatized populations, like combat veterans. This pattern of symptoms, known as [post-traumatic stress disorder](#), or PTSD, can include emotional numbness, intrusive memories of the traumatic event, and hyperarousal (increased awareness of one’s surroundings, or constantly being “on guard”).

[Research shows](#) that the majority of individuals who experience sexual assault demonstrate at least some of these symptoms of PTSD immediately after the assault and through the two weeks following the assault. Nine months after the assault, 30% of individuals still reported this pattern of symptoms. Overall, it is estimated show that nearly one-third of all victims of sexual assault will develop PTSD at some point in their lives.

These findings are complicated by the fact that the response of any given person to trauma can look extremely different, based on previous life experiences and health factors. Research has found that [cognitive variables](#), such as perceived negative responses of other people and poor coping strategies, were significantly linked both to development of PTSD and severity of PTSD. [In another study](#), lower cortisol levels as measured in the emergency room have been related to increased risk for the development of PTSD. In other words, a maladaptive version of nature/nurture is involved in individuals’ responses to trauma.

As with many questions related to health, it is difficult to pinpoint the cause: [existing neurobiological and psychosocial risk factors](#), such as mental illness, can contribute to the development of PTSD, and PTSD can lead to other health problems. There is no hard and fast rule of victimology: every individual who experiences sexual violence will respond differently.

Therefore, the detective who was unable to believe the story told to him by my crisis caller was likely misinterpreting the discrepancies in her story as lies, rather than as her brain's responses to extreme trauma. [Best practices](#) now suggest that officers wait at least two sleep cycles, generally 48 hours, before interviewing a victim of sexual violence. Additionally, the interview should be handled in a victim-centered manner, not as an interrogation. Research-informed practices have the potential for not only better outcomes for survivors of sexual violence, but also for reporting and prosecution rates for our legal system.

[Kathryn Gigler](#) is a doctoral candidate studying the cognitive neuroscience of learning and memory at Northwestern University. She also serves as director of the Women's Center at Elizabeth City State University.

A version of this column also appeared on Huffington Post as "[How Brain Science Can Help Explain Discrepancies in a Sexual Assault Survivor's Story](#)."

Are you a member of CNS with research you want to share? Consider contributing a guest post about your work or trends in the field. *It could then become part of the new HuffPost Science series exploring the surge of new research on the human brain.* Email your ideas to CNS Public Information Officer, Lisa M.P. Munoz (cns.publicaffairs@gmail.com).

EXHIBIT #5



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January 27, 2016

By Email

Hon. Catherine O'Hagan Wolfe, Clerk of Court
U.S. Court of Appeals for the Second Circuit
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *Price v. Simmons*, Case No. 16-243

Dear Ms. Wolfe:

The New York City Law Department respectfully requests that it be stricken from the docket sheet as appearing for defendants Detective Linda Simmons, Inspector Obe, and Rose Pierre-Louis in this appeal.

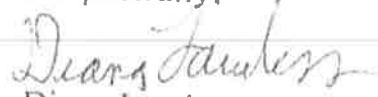
In this case, the district court dismissed the plaintiff's complaint *sua sponte*, apparently before these defendants had been served with process. These defendants did not appear before the district court, and thus the Law Department did not enter an appearance on their behalves. We therefore request that the Law Department not be listed on the docket sheet for this appeal as appearing as counsel for these defendants.

In addition, please note the attached order of the District Court dated January 26, 2016 (ECF No. 11), which granted the plaintiff reconsideration of the order appealed from.

We will continue to monitor the appeal as a matter of interest.

Thank you for your time and consideration.

Respectfully,

A handwritten signature in dark ink, appearing to read "Diana Lawless", is written over the printed name.

Diana Lawless

Assistant Corporation Counsel

encl: District Court order dated January 26, 2016 (ECF No. 11)

cc:, Kelly Price, appellant *pro se* (by U.S. mail)

Patricia J. Bailey, Assistant District Attorney (by U.S. mail)

EXHIBIT #6

18/2015 09:23

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SILVIA LAROCCA

PAGE 01/01

My name is Mark Christopher LaRocca. I worked as a Lieutenant in the New York City Police Department from 1997 to 2013 assigned to the 028 Precinct in Manhattan. circa 2010 and 2011, I had several conversations with Mrs. Kelly Price in which she claimed to be a crime victim, specifically a victim of domestic violence.

During my interviews of Mrs. Price, I found her allegations of abuse to be credible and with merit. I felt there was sufficient evidence to prepare Complaint Reports to document these allegations which would then be further investigated by the Precinct Domestic Violence Officers and/or the Precinct Detective Squad.

After speaking with the Detectives regarding Mrs. Price's allegations, I was informed that prior to a report being further investigated, a phone call to someone in the Manhattan District Attorney's Office who was familiar with Mrs. Price's history of reporting crimes needed to be consulted.

Mrs. Price informed me that she felt this hindered her ability to receive fair treatment regarding the investigation of her complaints. I informed her that as a victim, she should speak with the supervisor of the person at the Manhattan District Attorney's Office handling her complaints if she felt her complaints were being stonewalled and not acted upon in a fair manner.

MARK C. LAROCCA
Mark C. LaRocca